

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF LOUISIANA, STATE OF
MISSOURI, *et al.*

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et*
al.,

Defendants.

Case No. 3:22-cv-01213-TAD

**PLAINTIFFS' NOTICE OF FILING DEPOSITION
TRANSCRIPT AND EXHIBITS OF ERIC WALDO**

Plaintiffs State of Louisiana, State of Missouri, Dr. Jayanta Bhattacharya, Dr. Martin Kulldorff, Dr. Aaron Kheraity, Jim Hoft, and Jill Hines hereby give notice of filing the redacted certified deposition transcript and exhibits of the deposition of Eric Waldo. Attached to this Notice, redacted where necessary to comply with the Court's protective order, are Exhibits 1-54 from the deposition of Eric Waldo (labeled "Waldo Ex. 1" to "Waldo Ex. 54"), and the certified transcript of the deposition of Eric Waldo, also redacted where necessary to comply with the Court's protective order.

Dated: March 4, 2023

ANDREW BAILEY
Attorney General of Missouri

/s/ Charles F. Capps

Joshua M. Divine, Mo. Bar No. 69875*

Solicitor General

Charles F. Capps, Mo. Bar No. 72734*

Deputy Solicitor General

Todd A. Scott, Mo. Bar No. 56614*

Senior Counsel

Kenneth C. Capps, Mo. Bar No. 70908*

Assistant Attorney General

Missouri Attorney General's Office

Post Office Box 899

Jefferson City, MO 65102

Tel: (573) 751-8870

charles.capps@ago.mo.gov

Counsel for State of Missouri

Respectfully submitted,

JEFFREY M. LANDRY
Attorney General of Louisiana

/s/ Tracy Short

Elizabeth B. Murrill (La #20685)

Solicitor General

Tracy Short (La #23940)

Assistant Attorney General

D. John Sauer (Mo #58721)*

Special Assistant Attorney General

Louisiana Department of Justice

1885 N. Third Street

Baton Rouge, Louisiana

Tel: (225) 326-6766

murrille@ag.louisiana.gov

Counsel for State of Louisiana

/s/ Jenin Younes

Jenin Younes *

John J. Vecchione *

New Civil Liberties Alliance

1225 19th Street N.W., Suite 450

Washington, DC 20036

Direct: (202) 918-6905

E-mail: jenin.younes@ncla.legal

Counsel for Plaintiffs Dr. Jayanta

Bhattacharya,

Dr. Martin Kulldorff, Dr. Aaron Kheriaty,

and Jill Hines

/s/ John C. Burns

John C. Burns

Burns Law Firm

P.O. Box 191250

St. Louis, Missouri 63119

P: 314-329-5040

E-mail: john@burns-law-firm.com

Counsel for Plaintiff Jim Hoft

* admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that, on March 4, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ Tracy Short